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March 15, 2011

Donald G. Frankel
U.S. Department of Justice
Environmental and Natural Resource Division
Boston Field Office
One Gateway Center
Suite 616
Newton Corner, MA 02458

**Re: Settlement Communication Subject to Fed. R. Evidence 408 –
Additional measures and improvements under RCRA
Arecibo Municipal Landfill**

Dear Mr. Frankel:

As one of the respondents to the above referenced Order, Landfill Technologies of Arecibo Corp., (LTA) hereby submits proposed additional measures and improvements related to the Arecibo Municipal Landfill and its compliance status under RCRA.

1. **Footprint Delineation:** The Arecibo Municipal Solid Waste Landfill ("Arecibo Landfill") has been receiving solid wastes continually since the late 60's. At that time and for more than a decade, collected wastes were placed directly onto the bare land without any engineering controls or barriers. Also, due to the disorganized operational process employed historically, there are areas impacted by solid wastes that have not been clearly delineated in the Arecibo Landfill. However, to the South and East, the facility is clearly delineated by a storm water channel constructed by the U.S. Corps of Engineers (USCOE). Conversely, to the North and West there are still some

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areas free of solid wastes.

Respondents propose to install a total of ten (10) Delimitation Poles to the North of the Landfill. The Delimitation Poles will consist of wooden poles of at least six (6) inches in diameter and will extend at least five (5) feet from the existing elevation. The proposed location of the area where the 10 delimitation poles will be installed; shown in Drawing 5 of 7 of the attached set of drawings.

2. Partial Closure: LTA proposes that a final closure cover to the Landfill be installed, covering the side slopes up to an elevation of fifteen (15) meters in order to minimize any potential water intrusion into the solid waste mass, and also minimizing the leachate generation and the seepages through the bottom of the slopes. The total area expected to be closed is approximately sixteen (16) acres.

Storm water flowing from the side slopes should be directed into the storm water channel built by the USCOE, which borders the East and South perimeters of the Landfill. This should be done through the use of concrete pipes, thus minimizing the amount of storm water flowing to the property adjacent to the North perimeter of the Landfill.

As an additional element to the Partial Closure, Respondent proposes a lateral seepage - horizontal collection system that will extend to an approximate elevation of six (6) meters MSL or a meter higher than the road elevation level that will serve to intercept and collect any leachate being generated. The leachate would flow to the buried slope pipes connected to various sumps that will in turn be pumped to a storage tank. The pumps would be pneumatically activated at a two (2) inch force level. A pipeline would interconnect the leachate sumps to the 150,000 gallon leachate storage tank. The tank would hold the leachate until properly treated and disposed to a PRASA Waste Water Treatment Plant. Tanker trucks are expected to transport the leachate daily during weekdays.

3. Closure Plan: The Arecibo Landfill Closure Plan was submitted and approved by the local permitting agency, the Puerto Rico Environmental Quality Board in 2001. Respondent will review the existing Closure Plan to incorporate the Partial Closure Activities.

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Please be informed that the additional measures and improvements mentioned above have not been formally presented to or discussed with representatives of the Municipality of Arecibo and could therefore be subject to certain changes after their evaluation as respondents. Please let us know if you have any questions or need additional information regarding this matter.

Cordially,



Francis Torres

Enclosures: By E-Mail

c. Javier Vázquez, Esq.

Eng. José Zayas